

**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE**

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|-------------------------------------|---|---------------------------------|
| THOMAS A. EAMES, ROBERTA L. EAMES |) | |
| and TAMMY EAMES, on behalf of |) | |
| themselves and all others similarly |) | |
| situated, |) | |
| Plaintiffs, |) | Civil Action No. 04-CV-1324-KAJ |
| |) | |
| v. |) | |
| |) | |
| NATIONWIDE MUTUAL INSURANCE |) | |
| COMPANY, |) | |
| Defendant. |) | |

**DEFENDANT’S RESPONSES AND OBJECTIONS TO
PLAINTIFFS’ RULE 30(b)(6) MATTERS FOR EXAMINATION**

Defendant, Nationwide Mutual Insurance Company (“Nationwide”), responds as follows to the Rule 30(b)(6) Matters for Examination designated by Plaintiffs (“Plaintiffs’ Designation”) in connection with class discovery in this matter.

Objections to Definitions

Nationwide objects to the definition of “disputed practice” contained in Plaintiffs’ Designation as overbroad and vague and ambiguous.

Responses to Matters for Examination

Subject to and without waiver of the above objections to definitions, Nationwide further responds as follows to the correspondingly numbered paragraphs of Plaintiffs’ Designation:

1. Patricia A. Szlosek, Compliance Consultant Manager, Underwriting Staff Compliance, will testify as to the subjects identified in this paragraph.
2. Patricia A. Szlosek will testify as to the subjects identified in this paragraph.
3. Nationwide objects to this paragraph as beyond the scope of subjects properly designated for testimony by a representative of Nationwide. The Glenn Deaton Agency, Inc. is a separate and distinct entity from Nationwide.

4. Patricia A. Szlosek will testify as to the subjects identified in this paragraph.

5. Peter Oesterling, Esquire, V.P. Office of General Counsel, E-Discovery Liaison for this litigation will testify as to the subjects identified in this paragraph.

6. Nationwide objects to this paragraph to the extent that the documents produced by Nationwide speak for themselves as to their nature and content. Subject to and without waiver of this objection, Patricia A. Szlosek will testify as to the subjects identified in this paragraph.

7. Nationwide objects to this paragraph as beyond the scope of subjects properly designated for testimony by a representative of Nationwide. The entities set forth in this paragraph are separate and distinct entities from Nationwide. Nationwide further objects to this paragraph to the extent that the documents produced by these entities speak for themselves as to their nature and content.

8. Nationwide objects to this paragraph as overly broad, unduly burdensome, seeking confidential and proprietary information and beyond the scope of permissible class discovery as allowed by the Court at this stage.

9. Nationwide objects to this paragraph as overly broad, unduly burdensome, seeking confidential and proprietary information and beyond the scope of permissible class discovery as allowed by the Court at this stage.

10. Nationwide will provide the information requested in this paragraph to counsel for Plaintiffs.

11. Nationwide will provide the information requested in this paragraph to counsel for Plaintiffs.

12. Nationwide will provide the information requested in this paragraph to counsel for Plaintiffs.

13. Nationwide objects to this request as vague and ambiguous and overly broad. Subject to and without waiver of these objections, Peter Oesterling will testify as to the subjects identified in this paragraph.

SWARTZ CAMPBELL LLC

/s/Nicholas E. Skiles, Esquire

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